

IN THE DISTRICT COURT OF THE UNITED STATES

For the Western District of New York

**NOVEMBER 2010 GRAND JURY
(Impaneled 11/05/2010)**

THE UNITED STATES OF AMERICA

-vs-

INDICTMENT

ANGIE L. JENKINS

Violations:

Title 18, United States Code, Sections
2251(a), 2252A(a)(2), and 2422(b)
(3 Counts and Forfeiture Allegation)

**COUNT 1
(Production of Child Pornography)**

The Grand Jury Charges That:

In or about June of 2010, in the Western District of New York, and elsewhere, the defendant, ANGIE L. JENKINS, did knowingly use, persuade, induce, entice and coerce a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such sexually explicit conduct, knowing and having reason to know that such visual depiction would be transported and transmitted using any means and facility of interstate and foreign commerce and would be transported and transmitted in and affecting interstate and foreign commerce, and the visual depiction was produced and transmitted using materials that have been mailed and shipped and transported in and affecting interstate and foreign

commerce by any means, including by computer, was actually transported and transmitted using any means and facility of interstate and foreign commerce, and was actually transported and transmitted in and affecting interstate and foreign commerce.

All in violation of Title 18, United States Code, Section 2251(a) .

COUNT 2
(Receipt of Child Pornography)

The Grand Jury Further Charges That:

In or about June of 2010, in the Western District of New York, and elsewhere, the defendant, ANGIE L. JENKINS, did knowingly receive child pornography, as defined in Title 18, United States Code, Section 2256(8), using any means and facility of interstate and foreign commerce and that had been shipped and transported in and affecting interstate and foreign commerce by any means, including by computer.

All in violation of Title 18, United States Code, Section 2252A(a) (2) (A) .

COUNT 3
(Enticement of a Minor)

The Grand Jury Further Charges That:

Beginning in or about October of 2009, and continuing until on or about August 13, 2010, in the Western District of New York, and elsewhere, the defendant, ANGIE L. JENKINS, using a facility and means of interstate and foreign commerce, that is, cellular telephones and the internet, did knowingly persuade, induce, entice and coerce, and to attempt to persuade, induce, entice and coerce, an individual who had not yet attained the age of 18 years to engage in sexual activity for which the defendant could be charged with a criminal offense.

All in violation of Title 18, United States Code, Section 2422(b) .

FIRST FORFEITURE ALLEGATION
(Title 18, United States Code, Section 2253(a))

The Grand Jury Alleges That:

As a result of the foregoing offenses alleged in Counts 1 through 3 of this Indictment, the defendant, ANGIE L. JENKINS, shall forfeit to the United States pursuant to Title 18, United States Code, Section 2253(a)(1), any property which contains any visual depiction and pursuant to Title 18, United States Code,

Section 2253(a)(3), any and all property, real and personal, used or intended to be used to commit or to promote the commission of such offense, and all property traceable to such property, including but not limited to the following:

- a. One Dell Dimension E510 computer, bearing serial number 2935M81, and
- b. One Maxtor 6L160M0 160 GB SATA hard drive, bearing serial number L307QR8G.

DATED: Buffalo, New York, January 19, 2011.

WILLIAM J. HOCHUL, JR.
United States Attorney

BY: S/AARON J. MANGO
AARON J. MANGO
Assistant United States Attorney
United States Attorney's Office
Western District of New York
138 Delaware Avenue
Buffalo, New York 14202
716-843-5882
aaron.mango@usdoj.gov

A TRUE BILL:

S/FOREPERSON
FOREPERSON